

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,
Plaintiff,

vs.

No. CR 21-0303 MV

RYAN L. HARRIS,
Defendant.

**MOTION FOR FORM 13 PRE-PLEA
PRESENTENCE INVESTIGATION REPORT**

Defendant Ryan L. Harris, through his counsel of record, Kelly Alexis Golightley, respectfully moves this Court to enter an order for a Form 13 pre-plea presentence investigation report (PSR), and, as grounds, states:

1. Defendant is charged with being a felon in possession of a firearm and ammunition that has traveled in and affected interstate commerce. *See* Criminal Complaint [Doc. No. 1].
2. Plea discussions with the United States Attorney are ongoing and the parties believe that a Form 13 pre-plea PSR would assist them in reach a resolution or, in the alternative, give Defendant a better understanding of how much time he is facing if he were to assert his right to take case to trial.
3. Counsel contacted Assistant United States Attorney Letitia Carroll Simms, who states that the United States does not object to the relief requested herein.

WHEREFORE, counsel for Defendant Ryan L. Harris respectfully requests this Court enter an order directing U.S. Probation to prepare a Form 13 pre-plea presentence investigation report.

Respectfully submitted,

/s/ Kelly Alexis Golightley
KELLY ALEXIS GOLIGHTLEY
Counsel for the Defendant
620 Roma Avenue NW
Albuquerque, NM 87102
(505) 842-1200
kelly@golightleylaw.com

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2021 I filed the foregoing electronically through the CM/ECF system, which caused all counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Kelly Alexis Golightley
KELLY ALEXIS GOLIGHTLEY